

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

IN RE

MICHAEL S. HELMSTETTER,  
Debtor

) Case No.: 19-28687  
) Chapter 7  
) Hon. Jacqueline P. Cox  
)

**NOTICE OF OBJECTION PURSUANT TO  
SECOND AMENDED GENERAL ORDER NO. 20-03**

Pursuant to the Second Amended General Order No. 20-03, creditor Brown, Udell, Pomerantz & Delrahim, Ltd. ("BUPD") objects to the Chapter 7 Trustee's Motion for Approval of Settlement of Disputes with Kingdom Chevrolet, Inc., and Richard Ruscitti and Transfer of at Least 33% of Shares of Stock of Kingdom Chevrolet, Inc., 25% of Shares of South Chicago Nissan d/b/a Western Avenue Nissan to Kingdom Chevrolet, Inc. (the "Motion") (Dkt. 59). Among other reasons: (a) the Motion fails to sufficiently advise the Court or creditors of BUPD's secured claim with respect to the proceeds of the proposed settlement or provide for payment of the portion of BUPD's claim that is secured by the settlement proceeds pursuant to a statutory attorney's lien; and (b) the proposed settlement is for less than half of the amount of a previous settlement offer made to the debtor.

Dated: August 28, 2020

Respectfully Submitted,  
BROWN, UDELL, POMERANTZ & DELRAHIM,  
LTD.

By: /s/ Bryan D. King  
One of its attorneys

**CERTIFICATE OF SERVICE**

I, Bryan D. King, an attorney, certify that a copy of this Notice of Objection was served upon the persons listed on the attached service list on August 28, 2020, via electronic notice by Pacer/ECF.

Michael S. Pomerantz (ARDC # 6205384)  
Bryan King (ARDC # 6279203)  
Brown, Udell, Pomerantz & Delrahim, Ltd.  
225 W. Illinois Street, Suite 300  
Chicago, IL 60654  
312-475-9900  
mpomerantz@bupdlaw.com  
bking@bupdlaw.com

/s/ Bryan D. King

**SERVICE LIST**

Patrick S. Layng, U.S. Trustee

David R. Herzog, Herzog & Schwartz PC

Gregory K. Stern, Gregory K. Stern, P.C.

Richard L. Hirsh, Richard L. Hirsh, P.C.

Debra Devassy Babu, Askounis & Darcy, PC

Jamie L Burns, Levenfeld Pearlstein, LLC

Whitman H. Brisky, Mauck & Baker LLC

Christopher R. Schmidgall, Law Office of Garry A. Weiss, PC

Charles Tatelbaum, Tripp Scott PA

James M. Yannakopoulos, Koransky Bouwer & Poracky PC